Page 1 Internal

From: Beth Ericksen To: Leslie Heppler

Date: 07/07/2008 12:43 PM

Subject: Some PR SPRINGS Comments/M 047 090

CC: Emily Berry; Penny Berry

PR SPRINGS M/047/090 comments...

General: On the sub sections within each category on the cost estimation, please include the dollar amount. (BE)

Category 1. The spread sheet dollar amount of \$210,627 is different than the category one summary amount of \$263,427.

Page 50 of the draft indicates that some of the demolition activities will require burial. Have these costs been accounted for? If so, an explanation of that should be provided in the spread sheet or within a surety summary narrative. (BE)

Page 50 the new text uses the word proposed. Please remove the use of the word and write the narrative as though the Division has approved. (BE)

The first sentence of the Facilities and Materials paragraph requires some clarification and requires specific action outline. When reading it lends the impression that either burial or dismantling will occur. In reality dismantling will occur with the exception of the mentioned burial work. (BE)

Although the surety spreadsheet identifies the equipment used in category one reclamation. It is extremely helpful to provide the equipment within the reclamation narrative as well. (BE)

Page 51, the process train indicates process materials will be drained. Please elaborate on where the drainage will occur, and explain if the process materials are hazardous and/or are an impact to public health and safety. (BE)

There is indication that there are two process trains. It appears there are reclamation costs for only one. Please correct and/or explain. (BE)

Please provide the weight of one cubic yard of cut up process train. (BE)

Page 2 of the summary surety draft does not show costs for two process trains. (BE)

Page 49, reclamation activities will involve the Division. Surety release will not occur until the Division approves the reclamation work, which typically requires 'visual inspections'. It may be helpful to include narrative that indicates the reclamation activity obligations under the Act and rules. (BE)

Page 49, during interim and on going reclamation, a commitment should be made that indicates that maps will be submitted to the Division showing 'active roads' or a reference that the roads shown on the reclamation activities map are active during the early reclamation phases. (BE)

What are the road dimensions? (BE) - *
What is the water source for the water truck? (BE)

Page 49, correction is required, there is a comment that indicates that a variance is required for slopes exceeding 45°. That 45° rule is for highwall remediation. By rule, slopes are to be regraded to a stable configuration, and sloped to minimize safety hazards and erosion while promoting successful revegetation. Please remove/re-write the comment. (BE)

Spelling comment: regarding should be 'regrading', page 49. (BE)

What is the remaining height of the pits once sand mix has been placed? (BE)

Page 49, for clarity and to eliminate oversight, please relocate the comment under the title "DRILL HOLES', 2nd paragraph about the 'impounding pit'. (BE)

Page 49, if on site burial of facility components occurs, a solid waste permit may be required. Please make a statement to that affect. (BE)

Page 1/Surety Estimation under items to be removed, the mine office building is not included. Although ATCO removes it, please include it in the table and make that statement there as well. (BE)

For clarification purposes, does ATCO remove the mine office building without any prep work by operator? Does the mine office building have contents that must be removed? It is assumed gutting is required for this building and others. However, there is no cost. Please explain or include gutting costs.(BE)

The 'rates and seed mix' sheet shows that labor hourly rates are on pg 629 of the 2008 Means Heavy Construction Cost Data book. That page is an overview of 'new titles'. Please correct and reference the right pages from the book. (BE)

Clarification is required on the bond estimate summary for the following statements: Laborers, assumes 4/laborers per crane hour. If there is a total of 8 crane hours for removal of the water storage pond liner, then a multiplier (number of laborers/crane hour) is missing and should be included before multiplying by the dollars/hour. (BE)

Please place the cost (hourly/weekly rate) of the crane on the equipment costs table. (BE)

Page 1/6 of the bond summary worksheet shows a crane being used for the removal of several items, however the hourly equipment cost associated with the water storage pond liner is \$55.82. The item to be removed description specifically states that a crane will be used. Please clarify/correct. (BE)

Please check subtotal columns, especially the first one in each sub category. There appears to be consistent errors. Example, tanks (22): 49X47.05 = 2305.45, the cell shows 2290.00. There are more of these errors, please review and correct. (BE)

What is the basis for the crane hours/laborer hours relationship? (BE)

Page 2 of the bond estimate summary, please use standard the cost reference number format: NOT: 31 23.23.18 4700 but 31 23-23.18-4700. (BE)

Page 2 of the bond estimate summary, Please reference the \$/mile cost of \$2.04 (BE)

Page 2, bond estimate summary, there is a dedicated water truck, but no costs. Please correct. (BE)

Page 2 of bond estimate summary, ripping of concrete foundation in less than an hour is inaccurate. What is the concrete thickness? Is the concrete reinforced? Area is typically square feet and not acres for concrete ripping/burying. (BE)

Why is there just the equipment operator for concrete ripping? No laborers? No additional equipment? Please reevaluate these costs. (BE)

Page 3 of the bond estimate summary (2), indicates 61.5 acres will be graded. It is unclear how this number has been derived from the explanation given. (BE)

EMILY/PENNY: Please print and send to file M/047/090 Thank you!

Beth Ericksen Engineer State of Utah Department of Natural Resources Division of Oil, Gas, and Mining

contact information: ph: 801 538 5318

email: bethericksen@utah.gov Secretary: 801 538 5291